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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Amada Magdalena Gutierrez-Lopez and
Yohandi Perez Esquivel,

Plaintiffs,

v.

Federal Bureau of Investigation,

Defendant.

Case No. 2:23-cv-00933-GMN-DJA

**Stipulation and Order to Extend
Discovery Deadlines
(First Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request a 45-day extension of certain discovery deadlines as, and for the reasons, set forth below. There is a good cause for such extension as the parties have conducted discovery diligently and in good faith. This is the first request for an extension of the discovery schedule.

DISCOVERY COMPLETED

The parties have completed the following disclosures and discovery:

The parties served their respective initial disclosures and supplemented their disclosures.

Defendant served initial set of discovery requests to each Plaintiff. Plaintiffs responded to the initial requests and provided additional medical providers and places of employment.

Plaintiff Amada Magdalena Gutierrez-Lopez served her initial set of interrogatories to the Defendant. Defendant's responses are due on June 17, 2024.

Defendant served subpoenas for records to Plaintiffs' medical providers. Although

1 they have received some of Plaintiffs' medical records, there are still outstanding records
2 which the Defendant is expected to receive after the initial expert disclosure deadline.

3 **DISCOVERY REMAINING**

4 Defendant will need to respond to Plaintiff Gutierrez-Lopez' first set of
5 interrogatories. Defendant also needs to subpoena the medical records from the medical
6 providers recently disclosed by the Plaintiffs in their discovery responses and their
7 employment records. Plaintiffs and Defendant will need to disclose their initial and rebuttal
8 experts, and schedule expert depositions. Defendant is awaiting to receive some of
9 Plaintiff's medical records from subpoenaed medical providers. Plaintiff Gutierrez-Lopez'
10 deposition is set for June 4, 2024. Plaintiff Perez-Esquivel's deposition is set for June 5,
11 2024.

12 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

13 Defendant respectfully requests the additional time to obtain the remaining medical
14 records from Plaintiffs' medical providers and their employment records from their
15 employers regarding any lost wages, economic and future earning capacity claims. These
16 records are necessary for the parties' experts to analyze in the preparation of their expert
17 reports. Due to scheduling the parties have set the dates for the depositions of the two
18 plaintiffs on June 4 and June 5, 2024. If during these depositions, new information
19 becomes available, the parties will need the additional time to obtain additional documents
20 and/or records and conduct additional depositions. With the upcoming initial expert
21 disclosure deadline of June 17, 2024, the parties will not be able to obtain the above-
22 mentioned records and documents, conduct the Plaintiffs' depositions, retain any
23 additional experts, and get expert reports, which will be necessary for the litigation of this
24 case. For these reasons and in good cause, the parties request the 45-day extension of all
25 remaining discovery deadlines.

26 **EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

27 The following table sets forth the current deadlines and the proposed extended
28 deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Initial Expert Disclosures	June 17, 2024	August 1, 2024
Rebuttal Expert Disclosures	July 17, 2024	September 16, 2024
Discovery Cutoff	August 14, 2024	October 31, 2024
Dispositive Motions	September 13, 2024	December 16, 2024
Proposed Joint Pretrial Order	October 14, 2024	January 30, 2025 ¹

This request for an extension of time is not sought for any improper purpose including delay.

Respectfully submitted this 28th day of May 2024.

CRAIG P. KENNY & ASSOCIATES

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IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 5/29/2024

¹ If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.